

## **REMARKS**

In the Office Action dated April 15, 2008, claims 1-14 and 16-20 were presented for examination. Claim 1-7, 14, and 16-20 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Claims 1-14 and 16-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Lennon et al.*, U.S. Patent Publication No. 2002/0107973 in view of *Dickman et al.*, U.S. Patent No. 5,877,765.

Applicants wish to thank the Examiner for the careful and thorough review and action on the merits in this application.

### **I. Rejection under 35 U.S.C. §112**

In the Office Action dated April 15, 2008, claims 1-7, 14, and 16-20 were rejected under 35 U.S.C. §112, second paragraph as being indefinite. More specifically, the Examiner identified line 11 of claim 1 as not having proper antecedent basis for the limitation “said function”, and has noted a similar issue present in claim 14. Applicants have amended claim 1 to provide proper antecedent basis for the limitation of “said function.” However, with respect to claim 14, Applicants respectfully disagree. Proper antecedent basis for this limitation is found in line 4 of claim 14. Accordingly, Applicants respectfully request that the Examiner remove the rejection under 35 U.S.C. §112, second paragraph, and grant an allowance of claims 1-7, 14, and 16-20.

### **II. Rejection Under 35 U.S.C. §103(a)**

In the Office Action dated April 15, 2008, the Examiner rejected claims 1-14 and 16-20 as being unpatentable under 35 U.S.C. §103(a) by *Lennon et al.*, U.S. Patent Publication No. 2002/0707973 in view of *Dickman et al.*, U.S. Patent No. 5,877,765.

Applicants’ remarks pertaining to *Lennon et al.* and *Dickman et al.* in the prior communications are hereby incorporated by reference.

As noted in the outstanding Office Action and discussed with the Examiner during the interview of May 29, 2008, the Examiner requested a more positive recitation of the claimed functionality. More specifically, the Examiner requested that the claims be amended to positively recite management of a hardware device. Applicants have amended each of the independent claims to positively recite management of the hardware device. Furthermore, Applicants have also amended the claims to reflect generation of an interpretable format from a meta data description, and utilizing the interpretable format for management of the hardware

device. Support for the amendments is found in Figs. 2A and 2B. No new matter has been added to the application with the amendments presented herein.

Applicants have amended each of the independent claims to more specifically define the invention over the prior art of record. More specifically, each of the independent claims have been amended to positively recite management of a hardware device. The Examiner employs *Lennon et al.* as a prior art reference to support communication between a user and a managed object. *Lennon et al.* does not teach management of a hardware device. At most *Lennon et al.* may be employed to manage data. However, data is a software element, and Applicants are claiming management of a hardware device. Clearly, the management of data as taught by *Lennon et al.* is not the same as management of a hardware device as claimed by Applicants.

Similarly, *Dickman et al.* also does not teach management of a hardware device as claimed by Applicants. *Dickman et al.* pertains to employing shortcuts to facilitate browsing and searching over a network. As noted in the prior communication, the SET URL command of *Dickman et al.* does not support modifying parameters of any hardware device or managed object. Accordingly, it is Applicants' position that *Dickman et al.* fails to teach Applicants' claimed elements of management of a hardware device.

Accordingly, it is Applicants' position that the prior art of record falls short of teaching the claimed limitation of management of a hardware device. Neither *Lennon et al.* nor *Dickman et al.* teach or suggest managing a hardware device. Both of these prior art references teach software related issues, including access to multimedia content and creating a shortcut key on a desktop browser. The prior art references do not teach every element of Applicants' claimed invention. The *Lennon et al.* and *Dickman et al.* references individually or when combined are not sufficient to uphold a rejection under 35 U.S.C. §103(a) since individually or in combination they fail to teach all of the elements claimed by Applicants. Accordingly, Applicants respectfully contend that the combination of *Lennon et al.* and *Dickman et al.* do not meet the standard set by the CAFC's interpretation of 35 U.S.C. §103(a), and respectfully request that the Examiner remove the rejection and direct allowance of claims 1-14 and 16-20.

### **III. Conclusion**

Applicants believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. Applicants are not conceding in this application that the prior condition of these claims are not patentable over

the art cited by the Examiner, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the pending application. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications. Accordingly, Applicants request that the Examiner indicate allowability of claims 1-14 and 16-20, and that the application pass to issue. If the Examiner believes, for any reason, that personal communication will expedite prosecution of the application, the Examiner is hereby invited to telephone the undersigned at the number provided.

For the reasons outlined above, withdrawal of the rejection of record and an allowance of this application are respectfully requested.

Respectfully submitted,  
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